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COMMENTS:

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**CONTAINS NO CBI**

MR #337415-



Arkema Inc.  
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August 10, 2011

TSCA Document Control Officer (7407M)  
EPA East – Room 6428 Attn: Section 8(e)  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1201 Constitution Ave., NW  
Washington, DC 20004-3302



Subject: TSCA 8(e) Submission

Dear Sir/Madam:

Arkema Inc. (Arkema) is making this submission to the U.S. Environmental Protection Agency (EPA) pursuant to Toxic Substances Control Act (TSCA) Section 8(e). The submission provides information from a dose range-finding study conducted to assess chronic toxicity to *Daphnia magna* of dimethyl disulfide (CAS# 624-92-0).

This range-finding aquatic toxicity study was conducted according to OECD and EU test guidelines. Groups of five daphnids were exposed to test water at nominal concentrations in the range of 0.02 – 2.0 mg dimethyl disulfide /L. An EC50 for reproduction was not calculated, but appears to be in the range of 0.02 – 0.2 mg dimethyl disulfide. Analytical difficulties were encountered at the low dose in the range finding study. Further information will be available after the completion of the definitive study.

Nothing in this letter is considered confidential business information of Arkema Inc.

Arkema Inc. has not made a determination at this time that any significant risk of injury to the environment is presented by these preliminary findings. This information is submitted in accordance with the Arkema Inc.'s understanding of guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act or, where it is not clear that reporting criteria have been met, it is submitted as a precautionary measure and because it is information in which EPA may have an interest.

Questions regarding this submission may be directed to me at 610-205-7820 or via e-mail at [debra.randall@arkema.com](mailto:debra.randall@arkema.com).

Sincerely,

Debra Randall, DABT  
Manager, Product Safety



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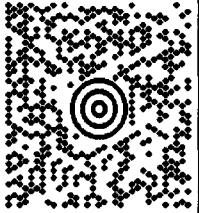

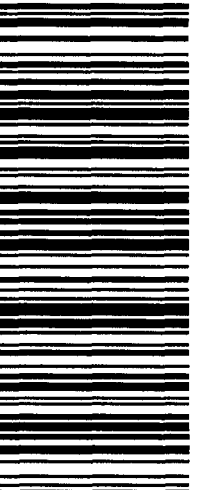

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